

EXHIBIT 8



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Sent via e-mail at cmarkos@williamscedar.com

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Sent via e-mail at rich@raiderslaw.com

Richard A. Raiders
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210 West Penn Avenue
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Robesonia, PA 19551

RE: Ellen Gerhart, et al. v. Energy Transfer Partners, L.P., et al.
Middle District Docket No. 1:17-vc-01726
Our File No: 1020.7346

Dear Attorneys Markos and Raiders:

As you know, I am in receipt of your Notice of Deposition of a Corporate Designee pursuant to Fed. R. Civ. P. 30(b)(6) for my client, TigerSwan. I am writing to you both today to address various objections that we have to the Notice of Deposition that I am hoping we can resolve without involving the Court.

Item No. 1: I object to my client presenting a designee on this topic because it is privileged by attorney work product doctrine. Specifically, my office prepared these written discovery requests without any input from my client.

Item No. 4: This Item is far too broad. You need to provide more specific parameters on these topics as they are entirely non-specific and it will be untenable to prepare the designee for this topic. Accordingly, I propose that you have this Item amended as follows: "TigerSwan

employees' communications with Nick Johnson, Robert Rice, and/or Kurt Merriweather pertaining to any work they may have performed in relation to the Mariner East II Pipeline and more specifically in the area near the Gerhart Property, as well as any documents concerning any relationship between Nick Johnson, Robert Rice, Kurt Merriweather, and TigerSwan as it pertains to the Marine East II Pipeline and more specifically in the area near the Gerhart Property." Please confirm that you are agreeable with this amendment to the Designee Notice.

Item No. 5: This Item is far too broad. You need to provide more specific parameters on these topics as they are entirely non-specific and it will be untenable to prepare the designee for this topic. Accordingly, I propose that you have this Item amended as follows: TigerSwan's work and services provided in relation to the Mariner East II Pipeline as it pertains to the Gerharts, their property, and Camp White Pine." Please confirm that you are agreeable with this amendment to the Designee Notice.

Item No. 7. My client's work performed in Pennsylvania that did not occur in Huntingdon County or not in relation to the Mariner East II Pipeline is entirely irrelevant to the present matter. It will be too burdensome and a poor use of resources to prepare a designee on these topics. Accordingly, my client objects to prepare and produce a designee on this Item. Please confirm that you will not expect the designee to be prepared to testify as to these topics.

Thank you for your attention to this matter. Please feel free to reach out with any questions.

Very truly yours,

S/Frank J. Lavery, Jr.

Frank J. Lavery, Jr.

FJL/alp

cc: Christopher P. Gerber, Esquire (via email)
Jessica S. Davis, Esquire (via email)
Stephanie Carfley, Esquire (via email)
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